

## Clifford Tucker

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**From:** Clifford Tucker  
**Sent:** Friday, January 24, 2020 6:01 PM  
**To:** 'Do-Kyung Kim'  
**Cc:** paralegal 10  
**Subject:** RE: NOTICE OF DEFAULT - Armando Sapon Sapon et al v. Hanbat Restaurant, Inc. et al (1:18-cv-11457-SLC)

Dear Mr. Kim,

That is agree-able to us. We will look out for the checks on that schedule. Thank you very much for your prompt follow up on this case.

All the best,

Clifford R. Tucker, Esq.  
Michael Faillace & Associates, P.C.  
One Grand Central Place  
60 East 42nd Street, Suite 4510  
New York, NY 10165  
(tel) 212-317-1200  
(fax) 212-317-1620  
[ctucker@faillacelaw.com](mailto:ctucker@faillacelaw.com)

**From:** Do-Kyung Kim [mailto:dkkimlaw@gmail.com]  
**Sent:** Friday, January 24, 2020 1:26 PM  
**To:** Clifford Tucker <ctucker@faillacelaw.com>  
**Subject:** Re: NOTICE OF DEFAULT - Armando Sapon Sapon et al v. Hanbat Restaurant, Inc. et al (1:18-cv-11457-SLC)

Dear Tucker:

the Client said that First payment on February 25, Second on April 25, Last on June 25.  
this schedule is feasible and available in his business situation.  
He promise and confirm above schedule.  
How about your opinion?  
wait for your reply!

DK Kim

On Thu, Jan 23, 2020 at 1:52 PM Clifford Tucker <[ctucker@faillacelaw.com](mailto:ctucker@faillacelaw.com)> wrote:

Dear Mr. Kim,

I am sorry to have interrupted your meeting. Thank you very much for taking our call. As you advised, we will resume our conversation at 3:30 pm today by phone.

Thank you again for your time and attention to this matter.

Sincerely,

Clifford R. Tucker, Esq.

Michael Faillace & Associates, P.C.

One Grand Central Place

60 East 42nd Street, Suite 4510

New York, NY 10165

(tel) 212-317-1200

(fax) 212-317-1620

[ctucker@faillacelaw.com](mailto:ctucker@faillacelaw.com)

**From:** Do-Kyung Kim [mailto:[dkkimlaw@gmail.com](mailto:dkkimlaw@gmail.com)]

**Sent:** Thursday, January 23, 2020 1:04 PM

**To:** Clifford Tucker <[ctucker@faillacelaw.com](mailto:ctucker@faillacelaw.com)>

**Subject:** Re: NOTICE OF DEFAULT - Armando Sapon Sapon et al v. Hanbat Restaurant, Inc. et al (1:18-cv-11457-SLC)

Dear Tucker:

we will pay the first payment as soon as possible.

I have to talk to my client and let you know that.

DK Kim

On Thu, Jan 23, 2020 at 10:44 AM Clifford Tucker <[ctucker@faillacelaw.com](mailto:ctucker@faillacelaw.com)> wrote:

Dear Mr. Kim,

Please allow this email to serve as formal notice of default of Defendants in making payments pursuant to the settlement agreement in the above-named action. Please instruct your clients to promptly cure the default by providing three checks in the amount of Eleven Thousand Six Hundred Sixty Six and Sixty Seven/100 dollars (\$11,666.67) made payable to “Michael Faillace and Associates, P.C.” for immediate deposit. The payment shall be made by sending the check via USPS, UPS, or Fedex with a tracking number to “Michael Faillace and Associates, P.C.” at 60 E. 42nd Street, Suite 4510, New York, New York 10165.

As set out in the settlement agreement, if your client fails to cure the default, we will be entitled to enter the Confessions of Judgment in the Supreme Court of the State of New York, New York County against Defendants and all property, of any kind, in which Defendant Nack Gyeun Mun has any ownership interest.

Please call us with any questions or concerns as they may arise.

Thank you for your time and attention to this matter.

Sincerely,

Clifford R. Tucker, Esq.

Michael Faillace & Associates, P.C.

One Grand Central Place

60 East 42nd Street, Suite 4510

New York, NY 10165

(tel) 212-317-1200

(fax) 212-317-1620

[ctucker@faillacelaw.com](mailto:ctucker@faillacelaw.com)

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Thank you,

**Do Kyung Kim, Esq.**

Law Firm of DK & Associates, P.C.  
141-25 Northern Blvd, Suite A 30  
Flushing, NY 11354  
Tel: (718) 460-2435 / (718) 460-9494

Fax: (888) 456-7938

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Thank you,

**Do Kyung Kim, Esq.**

Law Firm of DK & Associates, P.C.  
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Flushing, NY 11354  
Tel: (718) 460-2435 / (718) 460-9494  
Fax: (888) 456-7938

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